

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARCUS HILLIARD,	)	
	)	
PLAINTIFF,	)	
	)	Case No. 20-cv-1144
v.	)	
	)	Judge Martha M. Pacold
NATIONAL BOARD OF MEDICAL	)	
EXAMINERS and LOYOLA	)	Magistrate Judge Gabriel A. Fuentes
UNIVERSITY OF CHICAGO,	)	
	)	
DEFENDANTS.	)	

**UNOPPOSED MOTION FOR ADDITIONAL TIME TO COMPLETE  
SCHEDULED DEPOSITIONS**

Plaintiff Marcus Hilliard (“Plaintiff”) by his undersigned counsel, respectfully request an additional 15 days for disclosure of Rule 26(a)(2) expert disclosures and to extend expert discovery to August 11, 2023. In support of this motion, the Plaintiff states as follows:

1. Since the start of discovery in July 2023, the parties have been committed to moving this case forward and originally aimed to complete discovery within three months. *See* Dkt. Nos. 63, 64 (setting October 14, 2022 as the deadline to complete fact discovery). As a result of the significant volume of documents, the need for third-party discovery, and confidentiality issues related to the production of student and medical files, however, discovery took longer than anticipated to complete and the parties moved to extend the fact discovery deadline – first to December 15, 2022, then to January 30, 2023, and then to February 8, 2023 as the parties awaited additional third-party document productions. *See* Dkt. Nos. 72, 73, 78, 79, 81.

2. The parties completed fact discovery on February 8, respectively.

3. Pursuant to prior Order Plaintiff's Rule 26(a)(2) expert disclosure is due to be served by plaintiff on April 3, 2023. *See* Dkt. No. 79. The Court has granted one extension of Plaintiff's Rule 26(a)(2) disclosure to April 13, 2023. *See* Dkt. 86.

4. Plaintiff's expert recently advised that due to the Easter holiday, the length of the depositions (most depositions were over 5 hours in length), and the amount of deposition exhibits in this matter (more than 200 exhibits were used in depositions), it has taken him still longer than he anticipated to review all the material relevant to his report and draft his final report.

5. In order to allow Plaintiff's expert sufficient time to complete his report and Defendant sufficient time to prepare its expert disclosures in response, the parties propose the following schedule: Plaintiff's expert disclosures due April 28, 2023. Defendant's expert disclosures due June 30, 2023. Expert discovery to close on August 11, 2023.

6. Plaintiff agrees this would be the final extension for Plaintiff's disclosure in this matter.

7. Plaintiff brings this motion in good faith and not to unduly delay the proceeding.

WHEREFORE, the parties jointly and respectfully request that the Court grant this request and order Plaintiff's Rule 26(a)(2) expert disclosure is due to be served by plaintiff no later than April 28, 2023, and defendant no later than June 30, 2023, with expert discovery to be closed on August 11, 2023.

Dated: April 11, 2023

Respectfully Submitted,

**MARCUS HILLIARD**

/s/ Cynthia M. Rote

Cynthia M. Rote

Integrate Legal, PC

516 Main Street, Suite 1 | Pecatonica, IL 61063

[Cynthia@Integrate-Legal.com](mailto:Cynthia@Integrate-Legal.com) | (815) 255-4695